Message

From: Sullivan, Kate [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1AE54D9BB036451B8DF78D633B928662-SULLIVAN, KATE]
Sent: 7/23/2019 1:22:14 PM
To: Medina-Vera, Myriam [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b081a1f48a044b4c9d1ebc4992c54dee-Medina-Vera, Myriam]
Subject: RE: NJDEP request for EPA-NERL lab analysis

Sure. I'm asking to project out into the future. This is one of those cases where I would really like to meet whatever deadline we set for ourselves.
How are the labs coming anyway? Does it look like the'll be up in August?

Kate

From: Medina-Vera, Myriam
Sent: Tuesday, July 23, 2019 6:54 AM
To: Sullivan, Kate <Sullivan.Kate@epa.gov>; McCord, James <mccord.james@epa.gov>
Subject: RE: NJDEP request for EPA-NERL lab analysis

Kate,

The labs are still down. They have not been cleaned and they need the certification from safety. I think everyone in RTP is trying to do their best to get us back fully operational.

Myriam Medina-Vera, Ph.D.
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From: Sullivan, Kate
Sent: Monday, July 22, 2019 5:07 PM
To: McCord, James <mccord.james@epa.gov>; Medina-Vera, Myriam <Medina-Vera.Myriam@epa.gov>
Subject: FW: NJDEP request for EPA-NERL lab analysis

James and Myriam

Tim sent this request from NJDEP a couple of weeks ago—I just found it.

James, last week we talked about maybe getting some samples from NJ to add to the Michigan coming this week. NJ is not interested in targeted analysis so they let that pass. However, this request is for NTA doing semi-quantitative on NJ wells (internally labeled). They say about 15 samples.

Can you accommodate this request and on what schedule?

I'll call tomorrow to chat.

Kate

From: Buckley, Timothy
Sent: Wednesday, June 26, 2019 2:37 PM

To: Sullivan, Kate <Sullivan.Kate@epa.gov>; Medina-Vera, Myriam <Medina-Vera.Myriam@epa.gov>
Subject: FW: NJDEP request for EPA-NERL lab analysis

Myriam and Kate,

See request below. I have forwarded to TimW for approval. Anticipating his approval, can the two of you be thinking about how and when we might be able to get this done?

Thanks.

Tim

From: Bergman, Erica <Erica.Bergman@dep.nj.gov>
Sent: Tuesday, June 25, 2019 4:56 PM
To: Buckley, Timothy <Buckley.Timothy@epa.gov>
Cc: Azzam, Nidal <Azzam.Nidal@epa.gov>; Maybury, Steve <Steve.Maybury@dep.nj.gov>; Goodrow, Sandra <Sandra.Goodrow@dep.nj.gov>
Subject: NJDEP request for EPA-NERL lab analysis

Tim,

NJDEP is in receipt of some preliminary analytical information from EPA-NERL regarding the detection of chloro-perfluoro polyether carboxylate (ClPFPECA) congeners (known to be Solvay's PFAS replacement) in aqueous samples that correspond to several private drinking water locations. These samples were collected as part of the NJDEP-EPA-NERL and EPA Region 2 cooperative study "Detection, Evaluation, and Assignment of Multiple Poly- and Perfluoroalkyl Substances (PFAS) in Environmental Media from an Industrialized Area of New Jersey". EPA-NERL could not definitively quantify ClPFPECA due to the lack of an analytical standard, however potential concentrations could be elevated due to peak heights relative to known concentrations of other PFAS.

There is also a potential for human toxicity when exposed to these congeners, since NJDEP received Safety Data Sheets submitted by Solvay, which indicate toxicity in lab animals, specifically 28 day and 90 day repeated dose toxicity studies in rats which indicated that these PFAS cause liver toxicity at very low doses. NJDEP's toxicologist, Gloria Post Ph.D. DABT conducted a full review of Solvay's submittal and reports:

> "…the No Observed Adverse Effect Level (NOAEL) for three CAS #s in the 28 day rat study were below 0.3 mg/kg/day. This means that 0.3 mg/kg/day was the lowest dose used in the study, and that toxicity occurred at that dose. Therefore, a dose that did not cause toxicity (NOAEL) was not identified. For the 90 day rat study, the NOAEL was 0.05 mg/kg/day in males and 0.1 mg/kg/day in females. Since the same doses were likely used in both males and females, this indicates that toxicity occurred in males at 0.1 mg/kg/day (a very low dose). For comparison, the levels at which toxicity occurred for this substance are similar (or possibly even lower) than for PFOA and PFNA."

The private potable wells with detections of ClPFPECA congeners currently have Granular Activated Carbon (GAC) Point of Entry Treatment Systems (POETs) installed due to past detections of other PFAS (i.e., PFNA, PFOA) above NJDEP Groundwater Quality Standards, or Preliminary MCLs. However, it is unknown if the POETs are treating the ClPFPECA since there are no known treatability studies for this compound. NJDEP would like to sample 4-5 private well locations, including influent, mid-fluent and effluent samples for each location. This would be approximately 15 samples, not including QC samples. Does EPA-NERL have the capacity to analyze these aqueous samples for the ClPFPECA congeners? This analysis request could be considered outside the research study, and be more geared towards a public health concern/priority.

Please let us know if EPA/NERL can conduct this analysis and if so, when would they have the capacity? As discussed with Nidal Azzam (copied here), EPA-Region 2 shares our concerns regarding a potential public health issue and plan to support DEP's request for NERL analytical support. Please let me know if you need any additional information.

Thank you,

Erica Bergman
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